

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:20-cr-00054

NEDELTCHO VLADIMIROV

**FIFTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND
REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on March 16, 2020, and March 4, 2021, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

Third Supplemental Response:

In this case, the United States provides expansive discovery, which has been made available to defense counsel by disc on March 4, 2021, April 30, 2021, May 27, 2021, and by email on March 16, 2021. The United States hereby incorporates by reference its prior discovery responses on March 30, 2020 (ECF 34), May 20, 2020 (ECF 38), August 24, 2020 (ECF 48), March 18, 2021 (ECF 70), April 30, 2021 (ECF 75), and further supplements its responses as follows:

Request H: Disclose to defendant all evidence favorable to defendant, including impeachment evidence, and allow defendant to inspect, copy or photograph such evidence.

Response: The United States is unaware of any such evidence other than that which may otherwise be included herein and in its supplemental responses. As a precautionary measure, the United States discloses that the "boosters" referred to in the charging documents of this case and who may testify at trial have criminal records. The United States has endeavored to compile the criminal history on each potential witness and provides the criminal history records herein. By producing the records, the United States does not concede the records, or the information contained within, are admissible at trial.

REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

Respectfully submitted,

UNITED STATES OF AMERICA

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s/Andrew J. Tessman
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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "FIFTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY," has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 27th day of **May, 2021** to:

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Charleston, WV 25301-2912

By: s/ Andrew J. Tessman